



GAINOR & DONNER

3250 Mary Street
Suite 405
Miami, Florida 33131
O.[305.537-2000](tel:305.537.2000)
F.[305.537-2001](tel:305.537.2001)
C.[305.206.2008](tel:305.206.2008)
Gainorlaw@gmail.com
adonner@gainorlaw.org

September 27, 2023

BY ECF

The Honorable J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. John Costanzo Jr. and Manuel Recio*, 22 Cr. 281 (JPO)

Dear Judge Oetken:

This letter is respectfully submitted on behalf of defendant Manuel Recio, who hereby requests leave to file under seal and pursuant to the terms of the protective order (ECF No. 109), the Memorandum of Law and Declaration in Support of Motion in Limine Regarding Federal Rule of Evidence 801(d)(2)(E) Statements related to Mr. Recio and co-defendant John Costanzo, Jr.'s forthcoming motion in limine due today. This letter also encloses each of the exhibits referenced in the Declaration. The matters subject of the request to seal referenced herein are replete with sensitive disclosure materials that require their sealing.

Dated: September 27, 2023
New York, New York

Respectfully submitted,

s/Amber Donner
Gainor & Donner
3250 Mary Street
Suite 405
Miami, Florida 33133
Email: gainorlaw.com
Counsel for Manuel Recio

cc Via ECF: all counsel